Morse, Bob

From: Morse, Bob
Sent: Tuesday, April 14, 2020 2:46 PM
To: Moore, James T CIV USARMY CENAN (USA)
Cc: Melissa.Sweet@dec.ny.gov; Pocze, Doug; Badik, Beth; Mason, John
Subject: Seneca PFAS ESI Phase II Tech Memo - RTC and final version

Categories: EZ Record - Shared

Hi Jim. Hope you and your family are well.

EPA has reviewed the Army Response to Comments (RTC) to our comments on the draft PFAS ESI Phase II Tech Memo. Most of EPA's comments have been adequately addressed. However, there are a few things which may have been interpreted differently than we intended, which are addressed below. Also included below are new comments on the plan to collect soil samples in the study areas.

- **SEAD 25:**
  - The new SEAD 25 and Fire House proposed locations are good, however our first SEAD comment could still be addressed. While the newly-suggested MWFH-10/D is a good well location for delineating PFAS transport to SEAD 25, a bedrock well pair just northeast of the high-concentration area in SEAD 25 is still recommended (approximately located along the line between current wells MW25-25 and MW25-18). The combined effect of MWFH-10/D and the proposed well in this area would be to shed light upon both contaminant transport into SEAD 25 as well as the movement of contaminants *within* SEAD 25 bedrock, particularly within areas which may exhibit anomalous flow conditions.

- **SEAD 26:**

- Depending on the results of the newly-installed source area wells, it may still be prudent to install an additional monitoring well just downgradient of the southern end of the source area (where it appears there is a southerly component to groundwater flow at least some of the time). (Related to our final SEAD 26 comment)
- Side Note: It's worth taking note that some wells (MW26-20, MW26-13, and MW26-18) have low levels of PFOA and PFOS (<25 ppt), but hundreds of ppt of other PFAS such as PFHxA and PFPA. It may indicate subsurface transformation of PFAS contaminants as they travel through the aquifer, or it could indicate that some PFAS contaminants travel more readily than others

- **Soil Sampling:**
  - Rationale should be provided for the selection of a 6"-36" soil sampling interval
  - Within areas in which substantial heterogeneity is expected in the subsurface soils (e.g. in areas containing fill material overlying till within the vertical interval to be sampled), it is recommended that soil samples are split in order to capture potential differences in contaminant partitioning between the materials. This is particularly relevant where some portion of the material to be sampled is fill, given that the temporal relationship between the emplacement of fill and the timing of contaminant release is unclear.

END OF COMMENTS -

Please let me know if you have questions or if we need to discuss further. Thank you.

Bob

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